REMARKS/ARGUMENTS

Applicant thanks the Examiner for the telephonic interview of February 15, 2006, during which the Examiner indicated that amendments to the claims requiring certain operations to be automated, or performed automatically after receipt of a user command, coupled with the workstation-to-destination direct interaction would avoid the cited prior art.

The Examiner rejects claims 67-80, 72-97, and 99-118 under 35 U.S.C.§103(a) as being anticipated by Blaha (U.S. 5,469,504) in view of Curtis (U.S. 6,560,707).

Applicants disagree. Blaha and Curtis fails to teach or suggest, individually or collectively, at least the following italicized features in the pending independent claims:

> 67. A method of transferring a telephone call and associated data, comprising:
> receiving, on a workstation that is connected to a telephone call, a request to transfer the telephone call to a destination external to the workstation;
> *the workstation establishing a data communications link directly between the workstation and the destination;*
> *the workstation transferring, without human intervention after receipt of the transfer request, data associated with the telephone call to the destination via the communications link;*
> *the workstation receiving from the destination and without human intervention after receipt of the transfer request a telephone address of the destination;* and
> *requesting from the workstation that a switch external to the workstation transfer the telephone call to the telephone address of the destination.*
>
> 84. A method of transferring a voice communication and associated data, comprising:
> receiving, on a first workstation that is connected to a voice communication, a request to transfer the voice communication to a second workstation different from the first workstation;

the first workstation thereafter establishing, without human intervention after receipt of the transfer request, a direct data communications link between the first workstation and the second workstation;

the first workstation directly transferring data associated with the voice communication to the second workstation via the communications link; and

requesting from the first workstation that a switch external to the first and second workstations transfer the voice communication to a telephone address of the second workstation.

100. A method of transferring a voice communication and associated data, comprising:

providing a workstation, the workstation being connected to a voice communication, having in memory data associated with the voice communication, and being in receipt of a request to transfer the voice communication to a destination external to the workstation;

the workstation and destination establishing, without human intervention after receipt of and in response to the transfer request, a direct data communications link between the workstation and the destination;

the destination receiving, from the workstation and without human intervention after receipt of the transfer request, the data associated with the voice communication via the communications link;

the destination sending, without human intervention and after receipt of the transfer request, to the workstation a telephone address of the destination; and

the telephone address at the destination being connected to the voice communication by a switch external to the workstation.

105. A call center, comprising:

at least first and second workstations;

a data communications link directly between the at least first and second workstations; and

a switch operable to connect a telephone call to the at least one of the first and second workstations, the at least first and second workstations being external to the switch;

wherein, when the first workstation is connected to a telephone call, the first workstation is operable to effect the transfer of the telephone call to the second workstation by (a) transferring, without human intervention after receipt of a call transfer request from a user, data associated with the telephone call from the first workstation to the second workstation via the communications link and

(b) requesting that the switch transfer the telephone call to a telephone address of the second workstation.

111. A call center agent workstation, comprising:
a telephone operable to receive a telephone call;
an agent interface operable to receive a request from an agent to transfer the telephone call to a destination external to the workstation; and
a flow connection module operable, without agent intervention after receipt of the call transfer request, to (a) establish a data communications link directly between the workstation and the destination; (b) transfer data associated with the telephone call to the destination via the communications link; (c) receive from the destination a telephone address of the destination; and (d) request that a switch external to the workstation transfer the telephone call to the telephone address of the destination.

The present invention is directed to a call center in which voice communications, such as telephone calls, and associated data can be transferred directly and automatically between a workstation and a destination, particularly between workstations. The data is transferred by means of a data communications link established between the source and destination. The call itself is transferred from the workstation to the destination via a switch to an address preferably supplied by the destination.

Blaha

Blaha is directed to an ACD network 10 having a host database computer 12 and switches 14A and 14B. When a call is received by an internal subnetwork switch such as by switch 14A, an identification code is provided for each of the internal subnetwork switch, the number for the trunk which received the call, and the port of the subnetwork switch to which the agent unit selected to receive a call is connected. These values are maintained in a termination table associated with each voice path port of each switch. (Col. 4, lns. 44-64.) When a call is serviced by an agent, the agent gathers information which is stored on the servicing agent's computer. When the call is

transferred to another agent at another internal subnetwork 11B having an associated switch 14B, the call, along with the call origination identification information 40, is sent to the other internal subnetwork switch 14B. (Col. 5, lns. 51-66.) The call origination identification information 40, which is transferred from the switch 14A to the switch 14B includes the incoming port ID and the switch ID for the original customer call. (Col. 6, lines 10-18.) In response to the call arriving at the other subnetwork switch 14B, the call origination identification information is saved in the termination table for switch 14B. The customer call is then connected to the other agent unit 18B. In response to the call being connected to the agent 18B, the switch 14B sends the trunk-agent connect record 32 (containing the trunk port ID, the agent unit port ID, and the telephone number of the unit 18B to which the call is connected, to the host data base computer 12. (Col. 6, lines 39-47.) The host computer retrieves, from the original agent unit 18A/terminal 22A, the customer information, collected by the agent unit 18A/terminal 22A and the information originally sent to the unit 18A/terminal 22A and sends the information to the other unit 18B/terminal 22B when the host data base computer 12 receives the trunk-agent connect record 32. The information is displayed automatically on terminal 22B. (Col. 6, line 48-col. 7, line 25.) Simply put, Blaha states that the preferred steps are:

> (1) establishing a call origination identification code identifying the original trunk port and internal subnetwork switch in response to the agent unit receiving an original call from the external telephonic network, (2) conveying the call origination identification code to a host data base computer, (3) transferring the call origination identification code with an original customer call when the original customer call is transferred from one internal subnetwork to another internal subnetwork and (4) using the call origination identification at the other subnetwork to display the customer information at another agent unit of the other subnetwork to which the original call is transferred.

(Col. 7, lines 42-53.)

As can be seen from the above description, Blaha fails to teach or suggest (and in fact teaches away from) a first agent workstation establishing a data communications link directly with a target agent workstation, the first agent workstation (and not a central database) transferring the data directly to the target agent workstation, the first agent workstation receiving from the target agent workstation (and not from a switch associated with the workstation) a telephone number, and the first agent workstation requesting a switch to transfer the call to the telephone number of the second agent workstation. Blaha teaches that the host computer 12 (and not the transferring agent's terminal) sends the previously collected customer information from the display terminal 22A associated with the transferring agent to the destination terminal 22B when the host 12 receives the trunk-agent connect record 32 (col. 6, line 58 to col. 7, line 24) and that the address information for the destination terminal 22B is obtained not from the destination terminal 22B but from the memory 26B of the subnetwork switch receiving the transferred call for connection to the destination terminal 22B (col. 5, line 57 to col. 6, line 47).

Notwithstanding the foregoing, the Examiner again rejects the claims. The Examiner relies on col. 2-3, lines 65-68, (which states that an ACD transfers stored customer information *between* display terminals of different subnetworks (emphasis added)) and col. 2, lines 32-50 (which states that an ACD includes means for transferring a customer call from one agent unit to another agent unit and means for conveying information concerning the customer and *stored in the host data base computer* to the display terminal associated with the other agent unit (emphasis added)). (Office Action at pages 2-3.) The Examiner's arguments fail to address the fact that the *transferring workstation* establishes a data communications link directly between the workstation and destination workstation, and that data is transferred *by the workstation* to the destination workstation over this link. The language cited by the Examiner makes clear that the subnetwork switch itself and not the workstation transfers customer information stored in the host data base computer (and received from the transferring workstation) to the

destination subnetwork switch and workstation. As can be seen from Fig. 1, the agent units 18A are clearly separate and distinct from the subnetwork switch A. Regarding the claimed receipt of the phone number from the destination workstation, Blaha clearly teaches at col. 6, lines 39-65, that "the other switch 14B [the transferee switch and not the transferee workstation] sends the trunk-agent connect record 32 of Fig. 3 containing the trunk port ID . . ., the agent unit port ID . . ., and the telephone number . . . of the agent unit 18B to which the call is connected, to the host data base computer 12."

The Examiner attempts to overcome the express contrary teachings of Blaha by asserting that it would be obvious based on Curtis et al. to have two workstations in direct communication with each other.

Curtis et al.

Curtis et al. is directed to a media coordination system providing secure multimedia communication channels in a collaborative network environment. The media coordination system provides automatic encryption, dynamic interconnection of streams of data, and user interface elements that provide users with control over the ultimate destination of their audio and video data. The infrastructure includes a number of client workstations that are connected to a central server using point-to-point network connections. The central server maintains a persistent virtual world of network places with objects located therein. Streams of audio and video data are coordinated between client workstations operating in the persistent virtual world by a key manager object using channels, transmitters, and receivers. The client workstations multicast their audio and video data over the network to defined recipients after receiving a multicast address and an encryption key for a specific multicast channel.

Each client workstation displays a view on a virtual room object stored in an object database on the central server. Each client workstation provides visual identification of each user object located in the virtual room. The multicast A/V data appears to be multicast directly between workstations. Curtis et al. states that:

> The key manager 25 [in the central server] coordinates all A/V multicast data transmitted between each client 4 connected to a server 22. Once encryption keys have been generated for a particular source of A/V data, *the key manager is responsible for notifying clients 4 of appropriate multicast addresses* and encryption keys for use with out-of-band communication. Out-of-band communication is defined herein as data that is multicast between clients, while "in-band" communication is defined herein as all data that is passed from one client to other clients through server 22.

(Col. 12, lines 25-34 (emphasis supplied).) Each channel manager (which is in the central server along with the key manager) has an associated static or dynamic channel membership, which defines sources and sinks having access to a particular channel.

Even if it were obvious to modify the system of Blaha to incorporate the cooperative arrangement of Curtis et al. (which we believe it is not), neither Blaha nor Curtis et al. teach or suggest the transferring workstation obtaining the address of the transferee workstation from the transferee workstation rather than from the switch or server. Rather, both references teach that the address is obtained from the switch or server.

The Examiner responds to these arguments with the following counter-arguments:

(i) The claims fail to require a first agent workstation establishing a data communications link directly with a second or target workstation, the first workstation transferring data directly to the target agent workstation, the first agent workstation receiving from the target workstation a telephone number, and the first workstation requesting a switch to transfer the call to the telephone number of the target workstation. The claims recited above show that the Examiner is incorrect.

(ii) Blaha teaches the subject matter of (i) above. We disagree for the reasons stated above.

(iii) Without citing any supporting prior art, the Examiner states that the claims are not allowable as they read on an architecture in which a first agent simply text messages or sets up a chat session with a second agent as a way of requesting the

telephone number of the second workstation. The claims have been amended to require automatic operation of one or both of the following operations: (a) the transferring workstation providing, via a direct data communications link, data associated with the call to the destination and (b) the transferring workstation requesting and receiving from the destination the telephone address of the destination. It is Applicant's understanding from the interview that the amended claims are patentable over the cited prior art.

Accordingly, the independent claims are allowable.

The dependent claims provide further reasons for allowance. For example, Claim 70 teaches that the (source) workstation requests a destination selector for the data address. *(See also* Claims 87, 104, 107 and 114.)

Respectfully submitted,

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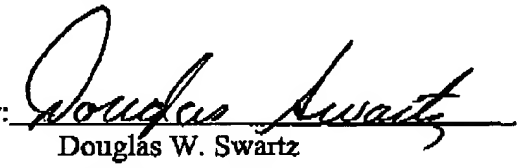
By: 

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Date: March 8, 2006

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